

Gregory O'Neill (GON 1944)  
Elizabeth A. McCoy (EAM 8448)  
HILL, BETTS & NASH LLP  
One World Financial Center  
200 Liberty Street, 26<sup>th</sup> Floor  
New York, NY 10281  
Telephone: (212) 839-7000  
Facsimile : (212) 466-0514

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

ARGO TURBOSERVE CORPORATION,

Plaintiff,

V.

DEAN ANGELLE AND DENISE  
ANGELLE,

Defendants.

Case No. 07-CIV-8410

**MOTION TO ADMIT COUNSEL**

**PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Gregory W. O'Neill, a member in good standing of the Bar of this Court, as counsel for Defendants, Dean Angelle and Denise Angelle, hereby move for an Order allowing the admission pro hac vice of

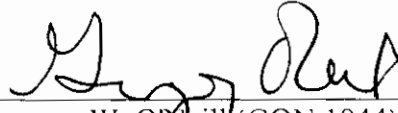
Eric Michael Liddick  
Jones, Walker, Wacchter, Poitevent,  
Carrère & Denègre, L.L.P.  
201 St. Charles Avenue, 51st Floor  
New Orleans, Louisiana 70170  
Telephone: (504) 582-8302  
Direct Facsimile: (504) 589-8302  
[eliddick@joneswalker.com](mailto:eliddick@joneswalker.com)

Eric Michael Liddick is a member in good standing of the Bar of the State of Louisiana. There are no pending disciplinary proceedings against Eric Michael Liddick in any State or Federal Court.

Dated: \_\_\_\_\_

New York, New York

Respectfully submitted,



\_\_\_\_\_  
Gregory W. O'Neill (GON 1944)  
Elizabeth A. McCoy (EAM 8448)  
HILL, BETTS & NASH LLP  
One World Financial Center  
200 Liberty Street, 26<sup>th</sup> Floor  
New York, NY 10281  
Telephone: (212) 839-7000  
Facsimile: (212) 466-0514  
Counsel for Defendants,  
Dean Angelle and Denise Angelle

Gregory O'Neill (GON 1944)  
Elizabeth A. McCoy (EAM 8448)  
HILL, BETTS & NASH LLP  
One World Financial Center  
200 Liberty Street, 26<sup>th</sup> Floor  
New York, NY 10281  
Telephone: (212) 839-7000  
Facsimile: (212) 466-0514

**UNITED STATES DISTRICT COURT**

**SOUTHERN DISTRICT OF NEW YORK**

ARGO TURBOSERVE CORPORATION,   V.  DEAN ANGELLE AND DENISE ANGELLE,  	Plaintiff,       Defendants.
---	---

Case No. 07-CIV-8410

**AFFIDAVIT OF  
GREGORY W. O'NEILL  
IN SUPPORT OF MOTION TO ADMIT  
COUNSEL PRO HAC VICE**

State of New York     )  
                                  )     ss:  
County of New York    )

Gregory W. O'Neill, being duly sworn, hereby deposes and says as follows:

1. I am counsel for Defendants in the above captioned action. I am familiar with the proceedings of this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendants' motion to admit Eric Michael Liddick as counsel pro hac vice to represent Defendants in this matter.
2. I am a member in good standing of the Bar of the State of New York, and was admitted to practice on December 31, 1974. I am also admitted to the Bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Eric Michael Liddick since October, 2007.
4. Mr. Liddick is an Associate at Jones, Walker, Waechter, Poitevent, Carrère & Denègre, L.L.P. in New Orleans, Louisiana.

5. I have found Mr. Liddick to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure.
6. Accordingly, I am pleased to move the admission of Eric Michael Liddick, pro hac vice.
7. I respectfully submit a proposed Order granting the admission of Eric Michael Liddick, pro hac vice, which is attached hereto as Exhibit A.

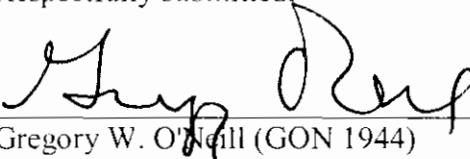
WHEREFORE, it is respectfully requested that the Motion to Admit Eric Michael Liddick, pro hac vice, to represent Defendants, Dean Angelle and Denise Angelle, in the above captioned matter, be granted.

Dated: \_\_\_\_\_

New York, NY

Notarized:

Respectfully submitted,



Gregory W. O'Neill (GON 1944)  
Elizabeth A. McCoy (EAM 8448)  
HILL, BETTS & NASH LLP  
One World Financial Center  
200 Liberty Street, 26<sup>th</sup> Floor  
New York, New York 10281  
Telephone: (212) 839-7000  
Facsimile : (212) 466-0514  
Counsel for Defendants,  
Dean Angelle and Denise Angelle

Gregory O'Neill (GON 1944)  
Elizabeth A. McCoy (EAM 8448)  
HILL, BETTS & NASH LLP  
One World Financial Center  
200 Liberty Street, 26<sup>th</sup> Floor  
New York, NY 10281  
Telephone: (212) 839-7000  
Facsimile: (212) 466-0514

**UNITED STATES DISTRICT COURT**

**SOUTHERN DISTRICT OF NEW YORK**

ARGO TURBOSERVE CORPORATION,

Plaintiff,

V.

DEAN ANGELLE AND DENISE  
ANGELLE,

Defendants.

Case No. 07-CIV-8410

**ORDER FOR ADMISSION  
PRO HAC VICE  
ON WRITTEN NOTICE**

Upon the Motion of Gregory W. O'Neill, attorney for Defendants, and said sponsor attorney's affidavit declaration that applicant Eric Michael Liddick is a member in good standing of the Bar of the State of Louisiana and that applicant's contact information is as follows:

Eric Michael Liddick  
Jones, Walker, Waechter, Poitevent,  
Carrère & Denègre, L.L.P.  
201 St. Charles Avenue, 51st Floor  
New Orleans, Louisiana 70170  
Telephone: (504) 582-8302  
Direct Facsimile: (504) 589-8302  
Email address: [eliddick@joneswalker.com](mailto:eliddick@joneswalker.com)

said applicant having requested admission pro hac vice to appear for all purposes as counsel for Defendants, Dean Angelle and Denisc Angelle, in the above entitled action;

**IT IS HEREBY ORDERED** that Eric Michael Liddick is admitted to practice pro hac vice as counsel for Defendants, Dean Angelle and Denise Angelle, in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated: \_\_\_\_\_

New York, NY

\_\_\_\_\_  
United States District Magistrate Judge

United States of America

State of Louisiana

**Supreme Court of the State of Louisiana**

---

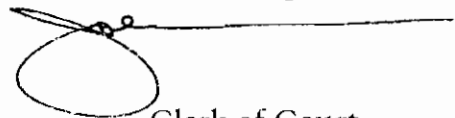
---

I, JOHN TARLTON OLIVIER, Clerk of the Supreme Court of the State of Louisiana, do hereby certify that

**ERIC LIDDICK, ESQ., #31237**

was duly admitted and licensed to practice as an attorney and counselor at law in this Court and the several courts of the State of Louisiana, on the 18th Day of October, 2007 A.D.; and is currently in good standing, and sufficiently qualified to perform the duties of an attorney and counselor at law.

IN WITNESS WHEREOF, I hereunto sign  
my name and affix the seal of this Court,  
at the City of New Orleans, this the 18th  
Day of October, 2007, A.D.

A handwritten signature in black ink, appearing to read "John Olivier", is written over a horizontal line. Below the line is a large, hand-drawn oval.

Clerk of Court  
Supreme Court of Louisiana

AFFIDAVIT OF SERVICE BY MAIL.

[illegible]

SUZANNE SAPORITO, being duly sworn deposes and says, I am not a party to the action and over 18 years of age. That on the 1st day of November 2007, she served the attached MOTION TO ADMIT COUNSEL (Eric Michael Liddick) PRO HAC VICE: AFFIDAVIT OF GREGORY W. O'NEILL; upon:

HOFMANN & ASSOCIATES  
17 Academy Street, Suite 415  
Newark, NJ 07102

Simon Harter, Esq.  
Law Offices of Simon Harter  
20 Nassau Street - Suite 211  
Princeton, NJ 08542

by depositing a true copy thereof enclosed in a post-paid wrapper, in an official depository under the exclusive care and custody of the U.S. Postal Service within New York State, addressed to each of the following persons at the last known address set forth after each name.

  
SUZANNE SAPORTIO

Sworn to before me this  
1st day of November 2007

H. J. J. J.  
Notary Public

**JANET M. WALTERS**  
**NOTARY PUBLIC, State of New York**  
**No. 61WAS000684**  
**Qualified in Kings County**  
**Commission Expires 7-2-11**